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14 Attorneys for Defendants

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16 **SUPERIOR COURT OF CALIFORNIA**
17
18 **COUNTY OF SAN DIEGO – CENTRAL DIVISION**

19 JANE DOE NOS. 1-14, inclusive,
20 individuals;

21 Plaintiffs,

22 v.

23 GIRLSDOPORN.COM, a business
24 organization, form unknown; MICHAEL J.
25 PRATT, an individual; ANDRE GARCIA,
26 an individual; MATTHEW WOLFE, an
27 individual; BLL MEDIA, INC., a California
28 corporation; BLL MEDIA HOLDINGS,
LLC, a Nevada limited liability company;
DOMI PUBLICATIONS, LLC, a Nevada
limited liability company; EG
PUBLICATIONS, INC., a California
corporation; MIM MEDIA, LLC, a
California limited liability company;
BUBBLEGUM FILMS, INC., a business
organization, form unknown; OH WELL
MEDIA LIMITED, a business organization,
form unknown; MERRO MEDIA, INC., a
California corporation; MERRO MEDIA
HOLDINGS, LLC, a Nevada limited liability
company; and ROES 1 - 500, inclusive,

Defendants.

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

10/04/2017 at 04:36:00 PM

Clerk of the Superior Court
By Katelin O'Keefe, Deputy Clerk

Case No. 37-2016-00019027-CU-FR-CTL

**DECLARATION OF MICHAEL PRATT
IN SUPPORT OF DEFENDANTS'
MOTION TO QUASH SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS
TO CLOUDFLARE, INC.**

Date: TBD by Discovery Referee
Time: TBD by Discovery Referee
Referee: Hon. Thomas Nugent (Ret.)
Location: Judicate West
402 W. Broadway Suite 2400,
San Diego, CA 92101

Assigned to: Hon. Gregory W. Pollack;
Dept. C-71

Complaint Filed: June 2, 2016
Trial Date: July 13, 2018

[IMAGED FILE]

1 I, Michael Pratt, declare:

2 1. As a manager or officer of the following defendants in this matter, GirlsDoporn.com, BLL
3 Media, Inc., BLL Media Holdings, LLC, EG Publications, Inc., M1M Media, LLC, and
4 Bubblegum Films, Inc. (collectively "Defendants"), I have personal knowledge of their business
5 operations.

6 2. The Defendants and I have never owned, controlled, been the administrator of, posted
7 videos to, or received revenues from www.SpankBang.com ("SpankBang" or "the website"), a
8 pornography website. In the past, I have had my attorneys send "DMCA" notices to SpankBang
9 to demand that videos be taken down from the website because the videos were stolen from
10 Defendants' websites and posted without authorization.

11
12 I declare under penalty of perjury under the laws of the State of California that the
13 information contained in this declaration is true and correct to the best of my knowledge.

14
15 Executed this 4th day of October, 2017 at San Diego, California.

16
17 
18 Michael Pratt